

BRIAN L. JOHNSRUD, State Bar No. 184474
JENNIFER LOTZ, State Bar No. 196925
DANIEL E. LASSEN, State Bar No. 271446
CURLEY, HURTGEN & JOHNSRUD LLP
4400 Bohannon Drive, Suite 230
Menlo Park, CA 94025
Telephone: 650.600.5300
Facsimile: 650.323.1002
E-mail: bjohnsrud@chjllp.com
jlotz@chjllp.com
dlassen@chjllp.com

Attorneys for Defendant
CISCO SYSTEMS, INC.¹

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE DIVISION

CALIFORNIA DEPARTMENT OF FAIR
EMPLOYMENT AND HOUSING, an
agency of the State of California,

Plaintiff,

v.

CISCO SYSTEMS, INC., a California
Corporation; SUNDAR IYER, an
individual; RAMANA KOMPELLA, an
individual,

Defendants.

Case No. 5:20-cv-04374-EJD

**JOINT STIPULATION FOR AMENDED
CASE MANAGEMENT SCHEDULE;
~~PROPOSED~~ ORDER**
(Civ. L.R. 6-1(b) and 6-2(a); Fed. R. Civ. P.
16(b)(4); Civ. L.R. 16-2(e))

Action Filed: June 30, 2020
Trial Date: None Set

Hon. Edward J. Davila

¹ Defendant Cisco Systems, Inc. has not yet been served and expressly reserves all substantive and procedural defenses.

STIPULATION

Pursuant to Civil Local Rule 6-1(b) and 6-2(a), Federal Rule of Civil Procedure 16(b)(4), and Civil Local Rule 16-2(e), Defendant Cisco Systems, Inc. (“Cisco”) and Plaintiff California Department of Fair Employment and Housing (“Plaintiff” or “DFEH”) (Cisco and the DFEH are referred to collectively herein as “the Parties”), through their attorneys of record, hereby stipulate and respectfully request that the Court modify the Clerk’s Notice Resetting Case Management Conference Following Reassignment dated July 13, 2020 (ECF-10), and the corresponding deadlines to meet and confer regarding early settlement, ADR process selection, and a discovery plan, to file the ADR Certification, and to file the Case Management Statement, to allow the individually-named Defendants, Sundar Iyer and Ramana Kompella, time to retain individual counsel and for their individual counsel to become familiar with the case and participate in the meet and confer process.

1. WHEREAS, Plaintiff filed the Complaint in this action on June 30, 2020;

2. WHEREAS, to date, no Defendant has been served with the Complaint and, accordingly, Defendants expressly reserve all substantive and procedural defenses;

3. WHEREAS, the individually-named Defendants, Sundar Iyer and Ramana Kompella, are in the process of retaining individual counsel;

4. WHEREAS, the Case Management Conference in this case is currently scheduled for October 8, 2020, at 10:00 a.m., with corresponding deadlines to meet and confer and file an ADR Certification on September 17, 2020, and to file the Case Management Statement on September 28, 2020;

5. WHEREAS, counsel for the individual Defendants will need time to become familiar with the case and participate in the meet and confer process;

6. WHEREAS, the Parties have therefore stipulated, subject to the Court’s approval, to defer the Case Management Conference and related deadlines by approximately five (5) weeks; and

7. WHEREAS, this case was only recently filed on June 30, 2020, Defendants have not yet been served, and there have been no previous time modifications.

NOW, THEREFORE, the Parties, through their respective counsel of record,
STIPULATE AND AGREE to the following modifications to the initial case management
schedule:

DEADLINE	CURRENT DATE	NEW DATE
Last day to meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan ² (Fed.R.Civ.P. 26(f) and ADR L.R. 3-5); and Last day to file ADR Certification signed by Parties and Counsel (Civil L.R. 16-8(b) and ADR L.R. 3-5(b))	September 17, 2020	October 22, 2020
Last day to file Case Management Statement per Standing Order re Contents of Joint Case Management Statement (Fed.R.Civ.P. 26(a)(1) and Civil L.R. 16-9)	September 28, 2020	November 5, 2020
Initial Case Management Conference (Civil L.R. 16-10)	October 8, 2020 at 10:00 a.m.	November 12, 2020 at 10:00 a.m. (or such other date as is convenient for the Court)

IT IS SO STIPULATED AND AGREED.

Dated: September 16, 2020

CURLEY, HURTGEN & JOHNSRUD LLP

By /s/ Brian L. Johnsrud
BRIAN L. JOHNSRUD
Attorneys for Defendant
CISCO SYSTEMS, INC.

² To the extent applicable, as this case is subject to General Order No. 71.

Dated: September 16, 2020

CALIFORNIA DEPARTMENT OF FAIR
EMPLOYMENT AND HOUSING

By /s/ Sirithon Thanasombat
SIRITHON THANASOMBAT
Senior Staff Counsel
Attorneys for Plaintiff
CALIFORNIA DEPARTMENT OF
FAIR EMPLOYMENT AND HOUSING

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest that I have obtained concurrence regarding the filing of this document from the other signatories to the document.

Dated: September 16, 2020

CURLEY, HURTGEN & JOHNSRUD LLP

By /s/ Brian L. Johnsrud
BRIAN L. JOHNSRUD
Attorneys for Defendant
CISCO SYSTEMS, INC.

~~PROPOSED~~ ORDER

Pursuant to the Joint Stipulation for Amended Case Management Schedule, it is hereby ordered the following deadlines on the initial case management schedule are modified as follows:

DEADLINE	CURRENT DATE	NEW DATE
Last day to meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan ³ (Fed.R.Civ.P. 26(f) and ADR L.R. 3-5); and Last day to file ADR Certification signed by Parties and Counsel (Civil	September 17, 2020	October 22, 2020

³ To the extent applicable, as this case is subject to General Order No. 71.

L.R. 16-8(b) and ADR L.R. 3-5(b))		
Last day to file Case Management Statement per Standing Order re Contents of Joint Case Management Statement (Fed.R.Civ.P. 26(a)(1) and Civil L.R. 16-9)	September 28, 2020	November ² 5 , 2020
Initial Case Management Conference (Civil L.R. 16-10)	October 8, 2020 at 10:00 a.m.	November 12, 2020 at 10:00 a.m. (or such other date as is convenient for the Court)

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: September 16, 2020



Hon. Edward J. Davila
United States District Court Judge